

BROMINATED SOLVENTS CONSORTIUM

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May 4, 2000

Dr. John Moore

Center for Evaluation of Risks to Human Reproduction (CERHR)

1800 Diagonal Road

Suite 500

Alexandria, VA 22314-2808

Re: March 20, 2000 65 FR 14997

Dear Dr. Moore:

I am writing on behalf of the Brominated Solvents Consortium (BSOC) in response to the March 20, 2000 Federal Register notice (65 FR 14997) regarding the CERHR solicitation of comments for further consideration of 1-bromopropane (n-propyl bromide, CAS # 106-94-5). BSOC is a trade association representing the major producers of n-propyl bromide (nPB), whose current members are Albemarle Corporation, Great Lakes Chemical Corporation and Dead Sea Bromine Group/Ameribrom, Inc. The March 20 Federal Register notice stated that CERHR is soliciting comments for its review of nPB, based on, among other things, published evidence of reproductive or developmental toxicity. In support of the US Environmental Protection Agency preceding under the Clean Air Act Significant New Alternatives Policy (SNAP) Program, BSOC has initiated a developmental toxicity study and a two -generation reproduction study for nPB.

In the developmental toxicity study, 50 pregnant Crl: CD(SD) IGS BR albino rats were exposed to 100, 498 and 996 ppm nPB for six hours per day for 13 days. Preliminary results from the BSOC developmental toxicity study did not show any malformations when maternal toxicity was demonstrated. The study was initiated in December 1998 and is expected to be finalized during the summer of 2000. During the two -generation reproduction study, 25 female and 25 male Sprague Dawley Crl:(SD)IGS BR rats were exposed to 0 (controls), 100, 250, 500 and 750 ppm of nPB via inhalation for six hours per day, seven days per week for ten weeks. The two -generation reproduction study was initiated in October 1999 and is expected to be finalized in October 2000.

BSOC requests that CERHR delay its review of the developmental and reproductive toxicity for nPB until the BSOC studies are completed. Once final reports are available, we will provide copies to CERHR.

Dr. John Moore
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Please do not hesitate to contact me if I can provide any additional information or clarification. I can be reached via electronic mail at bobf@regnet.com or by telephone at 202/637-9040.

Sincerely,

Original Signed
Robert J. Fensterheim
Executive Director

Received by JAM as Adobe file, converted to Word.